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05/23/05 9:50 pm

ATTACHMENT (4).TXT

Glacier  
National Organic Standards Board

c/o Arthur Neil

Room 4008?South Building

1400 Independence Avenue?SW

Washington, DC, 20250-0001

Re: Support of the NOSB?s draft pasture guidance document

Dear NOSB Members,

I am writing to express full support for the NOSB?s draft guidance document regarding pasture requirements for the

National Organic Program. I have the expectation that the USDA organic seal represents the true meaning of ?organic?

which includes pasturing of animals as required by the National Organic Program Standards.

I request that the NOSB approve the draft pasture guidance document as written including: ?Ruminant livestock

shall graze pasture during the months of the year when pasture can provide edible forage. The Organic System Plan shall

have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but

not less than 120 days. The Organic System Plan shall include a timeline showing how the producer will satisfy the goal

to maximize the pasture component of total feed used in the farm system.?

Lack of enforcement, on some operations, of the current Rule requirement for the pasturing of ruminants, including

lactating dairy cows, has led to the necessity for the inclusion of the above numerical standards in the guidance document.

Without clear, definitive wording, the intent of the Rule, with regards to pasture, will continue to be disregarded by some.

This wording gives certifiers an explicit minimum amount of grazing intake and minimum allowable grazing season that

will serve as a clear-cut trigger/guide in their certification process.

I firmly believe requiring significant pasture intake for ruminants, as this document promotes, represents a sustainable

agricultural system, providing multiple benefits to the animals, environment and the consumers of organic products.

Providing cows with access to pasture assures that organic principles are being met, with an interrelated system between

the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to

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cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and

enhanced immunity. Ruminants with access to pasture help ensure an organic production system that provides living

conditions that allow animals to satisfy their natural behavior patterns, provides the animals with preventative health care

benefits, and improves humane animal care and their welfare.

These benefits are passed down to consumers through more nutritious milk. A recent study conducted by the Danish

Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin

E, 75% higher in beta carotene and higher in omega 3 essential fatty acids than conventional milk. This study tied these

qualities to organic cows having room to graze and a diet high in fresh grass and clover, and forage

Allowing cows to go to their feed rather than bringing feed to the cows substantially reduces the use of non-renewable

resources and machinery required for feed transportation and ecological manure recycling. Responsible active

management of quality pasture is an excellent way to improve soil quality. Careful management of pasture ensures

maximum utilization and capture of solar energy, the basis of growing food.

I support the NOSB pasture guidance document and thank you for including clear, definitive minimums. The standards for

organic farms and food marketed under the USDA organic seal must not be compromised.

Sincerely,

I am an: \_\_\_\_organic dairy farmer

Signature ☒ \_\_\_\_organic consumer

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